

# Cahoy Dec. Ex. 19

Rebotix Repair LLC v Intuitive Surgical, Inc.

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1 UNITED STATES DISTRICT COURT  
2 MIDDLE DISTRICT OF FLORIDA  
3 TAMPA DIVISION  
4 CIVIL CASE NO. 8:20-cv-2274-T-33TGW

5 REBOTIX REPAIR LLC,

6 Plaintiff,

7 -vs-

8 INTUITIVE SURGICAL, INC.,

9 Defendant.

10 /

11 \* \* \* \* \*

12 HIGHLY CONFIDENTIAL

13 VIDEOTAPED

14 DEPOSITION OF: CHRIS GIBSON

15 DATE TAKEN: TUESDAY, JUNE 22, 2021

16 TIME: 10:04 A.M. - 6:15 P.M.

17 PLACE: BY VIDEOCONFERENCE

18 REPORTED BY: CARMEN THOMAS, REGISTERED  
19 PROFESSIONAL REPORTER AND  
20 NOTARY PUBLIC

21 \* \* \* \* \*

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1 Q -- safely?

2 MR. ERWIG: Sorry.

3 Object to the form and lacks foundation.

4 THE WITNESS: I don't know.

5 BY MS. LENT:

6 Q Did you ever tell any customers how many  
7 times they could expect to be able to reset the usage  
8 counter on an EndoWrist?

9 A I think we told them exactly what I said,  
10 that we can reset the counter an unlimited number of  
11 times, but not all EndoWrists will be available for the  
12 repair process because some of them will be so badly  
13 damaged or something else is wrong with them where they  
14 will not be a candidate for the repair service.

15 Q Did you have a rule of thumb that you used  
16 for the number of times you expected a particular  
17 EndoWrist to be able to be reset?

18 MR. ERWIG: Objection to form.

19 THE WITNESS: No, I don't believe so.

20 Because that is typically related to how the  
21 surgeon uses the different instruments in  
22 procedures.

23 BY MS. LENT:

24 Q Do you know whether any customer sent the  
25 same EndoWrist to Rebotix Repairs more than once to have

CERTIFICATE OF OATH

I, Carmen J. Thomas, Registered Professional  
Reporter, Notary Public, State of Florida, certify that  
witness, CHRIS GIBSON, appeared via videoconference on  
the 22nd day of June, 2021 and was duly sworn.

WITNESS my hand and official seal this 23rd day of  
June, 2021.



Carmen J. Thomas,  
Registered Professional Reporter  
Notary Public, State of Florida  
MY COMMISSION #GG 125902  
EXPIRES November 16, 2021